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December 4, 2014

Via ECF

Honorable Denise L. Cote
United States District Court for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *In re Application of The Coalition To Protect Clifton Bay and Louis Bacon for an Order Pursuant to 28 U.S. C. § 1782 to Conduct Discovery for Use in Foreign Proceedings*,
14 Misc. 258 (DLC)

Dear Judge Cote:

We are the attorneys for Respondent Stephen J. Feralio. Pursuant to the Court's direction at the September 11, 2014 court conference, we write to update the Court regarding our efforts to review and produce materials to Nygard International Partnership and Nygard Inc. responsive to the subpoena issued by Petitioners, The Coalition To Protect Clifton Bay and Louis Bacon.

Pursuant to the Court's direction, we completed the review of the iPhone files this week as well as the production of the Final Cut Pro files. On December 2, 2014, we produced to the Nygard Parties via Fed Ex a Concordance load file of iPhone documents Bates stamped SF-E-00000243 through SF-E-00002152. On December 3, 2014, we sent to the Nygard Parties via Fed Ex a 4 TB hard drive containing the Final Cut Pro files. This completes our review.

We are available to answer any questions the Court may have regarding our efforts. Given that we have completed our review and production of electronic files responsive to the Amended Subpoena, we respectfully request the Court's permission to cease providing weekly updates on our progress.

Respectfully submitted,

s/ Steven D. Feldman

Steven D. Feldman

cc: Counsel for Petitioners (by ECF)
Counsel for Nygard International Partnership and Nygard Inc. (by ECF)